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DEPARTMENT Health

STATE OF MINNESOTA

Office Memorandum

TO Rick Ferguson, Hydrologist
Division of Solid and Hazardous Waste, M.P.C.A.

DATE November 4, 1981

FROM Mike Convery, Hydrologist
Division of Environmental Health

PHONE

SUBJECT Review of Superfund Statement of Work (letter from Paul Bitter to Paul Beam).

I have reviewed the Superfund Statement of Work prepared by Paul Bitter of Region V to contract the services of Roy F. Weston. There are a number of corrections to be noted in the introductory text. I have only a few comments on the Statement of Work.

A. Background:

It may not be appropriate to classify the entire site as a waste disposal site, particularly the entire area of condominium development. There are certainly areas within the site that have been used for waste disposal, as is apparent in the aerial photographs and in sworn affidavits.

The main contaminant of concern to date is a class of organic compounds known as polynuclear aromatic hydrocarbons. It may be incorrect to identify PAH compounds as the main contaminant, without some further clarification of the term "main contaminant" PAH compounds do not include phenols and creosote, rather PAH's are constituents of creosote. Phenols are a completely different class of compounds.

It appears that Paul Bitter may be confusing the marsh area flanking T.H.7 which received wastewater from Republic Creosote with storage lagoons. To my understanding, there was only one storage lagoon for processing water on the site, situated in the southeast corner. You may wish to confirm this with Steve Reed.

B. Need for Emergency Containment Action and Drainage Control

Over the past 3 years, seven municipal wells have been removed from service, six in St. Louis Park and one in Hopkins. As each well is removed from service, contaminated groundwater tends to migrate to active high-capacity municipal wells.

The understanding of contaminant movement is not entirely correct. The soil is indeed contaminated with PAH's (and other organics), but the bulk of contaminants is probably already within the saturated zone. The area is also storm-sewered and the amount of direct run off on to the site is not very significant. Although, there are probably some improvements that could be made, I'm somewhat disturbed that E.P.A. continues to focus attention on emergency drainage programs.

Site Status:

The storm water retention pond on the former Republic Site is in the south-central area of the site, not in the northeast corner.

Air contamination is not currently a major problem, but will certainly be an issue when any exc[illegible]n occurs. The description that two on-site wells are

filled from 300-900 feet with tar and creosote is not correct. Well 105 (Sugar Beet Co. Well) is filled with debris and sand at the top of the well. The nature of the fill material in the well is not known. Well 23 (Republic Creosote Well) contains a plug of coal tar at 596 feet. It may be filled with sand and inert debris or it may be filled with coal tar (or both).

Six of the seven municipal wells that have been closed did contain both carcinogenic and non-carcinogenic PAH's. The Hopkins well simply contained high levels of non-carcinogenic PAH's. Also, there are not very many private wells that are active in the area.

Statement of Work:

The proposed development of the Environmental Assessment of the Hickok Remedial Program and any other remedial alternatives seems adequate. The description appears to be generic and covers most of the general environmental questions. The proposed timetable will have to be revised.

MPC:ls

cc: Dennis Coyne, M.P.C.A., A.G.
David Geise, M.D.H.